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SAXON MORTGAGE SERVICES, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

MARIE GAUDIN, individually, and on
behalf of others similarly situated,

Plaintiffs,

vs.

SAXON MORTGAGE SERVICES, INC.,
a Texas corporation,

Defendant.

Case No.: 3:11-cv-01663-JST

CLASS ACTION

**STIPULATION AND ~~PROPOSED~~
ORDER TO APPROVE FORM OF
CORRECTIVE NOTICE**

The parties hereby stipulate and request an Order approving the form of the Corrective Notice to be mailed to each recipient who received Class Notice, but has been identified as not being a Class Member.

1. On February 28, 2012, and in secondary mailings thereafter, Class Notice was mailed to 2,894 recipients whom the parties believed satisfied the Class Definition. That Class Notice is attached hereto as **Exhibit A**.

2. Subsequently, Saxon has identified 192 of these recipients as not fitting the Class Definition ("Non-Class Members").
3. In the Case Management Statement filed September 10, 2014, the parties agreed to an October 15, 2014 deadline to mail Corrective Notices to the Non-Class Members.
4. The Court set the October 15, 2014 deadline for mailing corrective notices in the Scheduling Order it issued on October 9, 2014.
5. On October 14, 2015, the parties stipulated to, and the Court Ordered, an extension of the deadline for mailing corrective notices to November 14, 2014.
6. The parties stipulate to Corrective Notice in the form attached hereto as **Exhibit B** and respectfully seek an Order from the Court approving the Corrective Notice in this form.

IT IS SO STIPULATED.

DATED: October __, 2014

SEVERSON & WERSON
A Professional Corporation

By: /s/ Erik Kemp
Erik Kemp

BINGHAM MCCUTCHEN LLP

By: /s/ Laila Abou-Rahme
Laila Abou-Rahme

*Attorneys for Defendant,
Saxon Mortgage Services, Inc.*

LAW OFFICE OF PETER FREDMAN

By: /s/ Peter Fredman
Peter Fredman

*Attorneys for Plaintiff,
Marie Gaudin, individually and on behalf of
others similarly situated*

1 I, Erik W. Kemp, am the ECF user whose identification and password are being used to file this
2 Stipulation and [Proposed] Order to Approve the Form of Corrective Notices I hereby attest that
3 Laila Abou-Rahme and Peter Fredman have concurred in this filing.
4

5 /s/ Erik Kemp

6 **ORDER**

7
8 1. The stipulated form of Corrective Notice is hereby approved.

9 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

10
11 Dated: November 3, 2014

